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September 20, 2024

Via ECF

Hon. Lewis J. Liman
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Freeman et al v. Giuliani*, 24-mc-00353-LJL

Dear Judge Liman:

I write in response to the Court's order, entered this morning. ECF 37.

I was surprised by the content of Mr. Nathan's letter of last night. ECF 35. It had been my understanding that Plaintiffs *want* the New York Apartment sold and monetized. After reading the letter, counsel had a phone call to discuss this issue and numerous other issues relating to the turnover of property, both real and personal. Counsel had what I believe was a constructive discussion, which will continue after the upcoming holiday (which, of course, starts this evening). I assure the Court, as I assured Plaintiffs' counsel, that while those discussions continue, Defendant will take no further action with respect to the Apartment, its listing or de-listing or marketing, and no further action that could be construed as interference or a violation of a restraining notice.

I respectfully suggest that no judicial action is necessary at this time. If, however, the Court requires a further submission from the defense, I respectfully ask the Court to fix a date for any such submission on October 6, 2024, or later.

Respectfully Submitted,

/s/ Kenneth A. Caruso
Kenneth A. Caruso

cc: Counsel of Record